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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 IN RE: UBER TECHNOLOGIES, INC.,
13 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

14 **DECLARATION OF DOUGLAS GRUBBS**
IN SUPPORT OF PLAINTIFFS' PORTION
OF THE JOINT LETTER REGARDING
PULASKI KHERKHER PLAINTIFFS'
COMPLIANCE WITH NOVEMBER 18, 2024
PFS ORDER

15 This Document Relates to:

16 T.T., No. 3:24-cv-03004;
T.C., No. 3:24-cv-03956;
17 C.S., No. 3:24-cv-06923;
18 B.S., No. 3:24-cv-06948; and
S.H., No. 3:24-cv-07156.
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Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

DECLARATION OF DOUGLAS GRUBBS

I, Douglas Grubbs, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Pearland, Texas. I respectfully submit this declaration in support of Plaintiffs identified in Exhibit A (collectively, “Plaintiffs”) portion of the joint letter brief regarding certain Pulaski Kherkher, PLLC (“Pulaski Kherkher”) Plaintiffs’ compliance with the Court’s November 18, 2024 Plaintiff Fact Sheet (“PFS”) Order.

2. I am of counsel to the law firm of Pulaski Kherkher, PLLC, representing numerous Plaintiffs in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the State Bar of Texas and I have been admitted *pro hac vice* in this litigation. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. The Plaintiffs’ response to the alleged non-compliance is identified in the table attached to Kyle Smith’s Declaration.

4. Uber emailed Pulaski Kherkher regarding the non-compliance of the Plaintiffs listed in Exhibit A on December 20, 2024. The parties met and conferred on December 23, 2024. Following this meet and confer, the parties were unable to resolve the dispute set out in the joint letter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 3, 2025, in Houston, Texas.

/s/ D. Douglas Grubbs

Douglas Grubbs